

TO: Bruce Schumaker, Office of Enforcement, THROUGH: Joseph M. Mikuha, Chief, Region IV AND Joseph A. Miller, Assistant Chief  
FROM: Gregory Cunningham, Enforcement Unit DATE JUN 2 1981

SUBJECT: Inspection of Asbestos Dump, TIFA, Limited, Millington, Passaic Township, Morris County

Reports in the Division file indicates that Gold Bond Building Products of National Gypsum Company once operated an industrial site now owned by TIFA in Millington, Passaic Township, Morris County. National Gypsum made asbestos cement board from portland cement, silica sand and asbestos. Waste asbestos was allegedly dumped on the facility at a site adjacent to the Passaic River between the years 1927 and 1952 by Asbestos LTD, and Smith Asbestos. In 1953 National Gypsum bought the property and their plant manager George Reilly signed an affidavit in 1975 stating that the company never added any waste material on the pile. TIFA, the current occupant of the site, does not use asbestos in their manufacturing operations.

The files further show that National Gypsum operated an industrial waste treatment system to remove asbestos and other solids prior to discharge into the Passaic (NPDES # NJ0002429). Industrial wastes were recirculated through a closed system to reclaim most of the solids. At the end of each day the system was drained and the waste flowed by gravity into a primary and a secondary lagoon and then into the Passaic River. A report dated 1962 stated that solids were trucked away to a land fill. In addition to these two lagoons National Gypsum dumped acrylic paint wastes into another lagoon. These wastes simply infiltrated into the soil. The plant closed in 1975.

On October 11, 1977 the Millington Planning Board approved a resolution, subject to several conditions, allowing TIFA to occupy the site. One of these conditions was that TIFA shall comply with all terms and conditions which are required by the New Jersey Department of Environmental Protection after being directed to do so. A member of the planning board said if TIFA does not abide with any of the listed conditions, the building inspector will remove the occupancy agreement.

On February 11, 1978 the Solid Waste Administration ordered National Gypsum to cover the exposed waste materials to prevent the erosion of these materials into the Passaic River. A sampling investigation by the Division of Water Resources in March 1978 showed at that time that the dump did not contribute to asbestos pollution to the Passaic River.

On March 26, 1981, the writer and several representatives of the Department inspected the abandoned asbestos dump and met with Mr. Arnold Livingston of TIFA and Mr. Joseph Seidel, TIFA's attorney. The Department representatives were Lisa Fleming and Don Patterson of Pesticides, Tessie Wishart and Robert Mueller of Cancer and Toxic Substances, Larry Muzyka, David Bute and Dennis Faherty of the Division of Hazardous Management. Mr. Seidel told the writer that the asbestos dump is the responsibility of National Gypsum and TIFA refuses to take any responsibility for the dump.

The writer determined from an engineering drawing submitted to the Division by National Gypsum that the dump extends approximately 450 feet along the Passaic River. Along the river the asbestos pile has a very steep slope and the writer estimates the pile rises vertically about 20 feet or more within a horizontal distance of only 15 feet. The slope along the river was covered with a vegetative growth of small bushes (possibly purposely grown to prevent the asbestos from eroding into the river). The writer observed that the vegetation completely covered the asbestos except in two or three narrow pedestrian pathways extending from the base to the top of the asbestos mound. A pile of rock rip rap was located on the river bank at the base of the asbestos mound. These rocks were probably deposited to help stabilize the bank and prevent the erosion of asbestos into the river.

On the southern end of the asbestos dump (see attached diagram) the writer saw a culvert with a pipe approximately 3 feet in diameter. Mr. Seidel explained that all storm water flow from TIFA's property (excluding the storm water which originates on the asbestos dump) and some storm water upstream of the facility flows into TIFA's storm water sewer system (see attached diagram). Although the sewer passes through a portion of the dump, Seidel claimed that the storm sewer was constructed with such integrity that no asbestos can infiltrate into the pipe and discharge into the river.

On May 11, 1981 the writer collected several water samples to be analyzed by the State Department of Health for asbestos in the immediate vicinity of this abandoned dump. (See attached diagram for sampling location). Although very heavy rains fell throughout the day the inspection began 3:45 p.m. during a rainless period. No rain fell until 4:25 p.m. A sample of the storm water flowing from the culvert was collected at 4:00 p.m. (C29507). This sample was slightly turbid. A sample of this storm water was also collected prior to discharge into the Passaic River (C29508) at 4:20 p.m. A torrential downpour began at 4:25 and extended until the end of the inspection. A sample was collected several hundred feet upstream of the dump at 4:35 p.m. (C29509).

At 5:05 p.m. the writer collected another sample of the discharge from the culvert. (C29510). This time the flow from the culvert had increased and the discharge was much more turbid than at 4:00 p.m. A sample was collected downstream of the dump on the upstream side of the bridge (C29511). This sample was probably greatly influenced by the discharge from the culvert. The writer will distribute the results of this sampling as soon as they become available.

During the heavy rainfall the writer made the following observations:

- 1) The vegetation and the rip rap appears to be very effective in preventing runoff of asbestos into the river from the dump. During very heavy rainfall the writer did not observe any asbestos flowing into the river.
- 2) A serious contamination problem can possibly exist in the areas denuded by vegetation. Although no asbestos was visually seen flowing into the Passaic River, the writer observed that in these bare areas, runoff carried asbestos particles down the slope. During an extremely heavy period of rain, the possibility exists that runoff, contaminated with asbestos, can enter the river.

- 3) The storm water discharge from the culvert could be a potential threat for asbestos pollution to the Passaic River.

RECOMMENDATIONS:

- 1) If asbestos fibres are found in significant quantities in the storm water discharge from the culvert, TIFA should reroute the storm water flow around the asbestos dump.
- 2) TIFA should plant vegetation in the areas of exposed asbestos and fence the entire area to prevent future erosion of the asbestos mound if the dump does not contribute to water pollution.

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Lisa Fleming, Pesticides  
Tessie Wishart, Cancer & Toxic Substances  
Larry Muzyka, Division of Hazardous Management  
David Bute, Division of Hazardous Management  
Dennis Faherty, Division of Hazardous Management

Attachments